

# EXHIBIT B

**THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

ROTHSCHILD CONNECTED DEVICES  
INNOVATIONS, LLC

Plaintiff,

v.

GUARDIAN PROTECTION SERVICES, INC.

ADS SECURITY, LP

*Defendants.*

§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§

2:15-cv-01431-JRG-RSP

**(Lead Case)**

2:15-CV-01463-JRG-RSP

---

**DECLARATION OF LEIGH ROTHSCCHILD**

---

I, Leigh M. Rothschild, declare as follows:

1. I am over the age of twenty-one, I currently reside, and have resided at all times material to this action, in Miami, FL, I am competent to make this Declaration, and the facts set forth in this Declaration are based upon my personal knowledge and documents provided and maintained by me in the ordinary course of business.

2. I am the managing member of Rothschild Connected Devices Innovations, LLC (“RCDI”), a Texas limited liability company.

2. I, Leigh Rothschild, have never been personally served with process in this matter and, upon information and belief, I am not a party in this matter


3. Upon information and belief, ADS has filed a Motion for me to show cause as to why I should not be held jointly and severally liable with RCDI.

4. If attorney’s fees are being considered against me under a legal theory yet to be enunciated by ADS in a charging document or complaint with which I have not been served, I hereby request that due process be afforded to me by (i) ADS by providing a charging document,

(ii) serving me with process that personally subjects me to the jurisdiction of this court, and (iii) that I be afforded an opportunity to retain personal counsel and provide a written defense to the charging document.

I declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true.

Date: July 10, 2018

  
\_\_\_\_\_  
Leigh M. Rothschild